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July 18, 2023

The Honorable Brian D. Lynch
Bankruptcy Court
Western District of Washington
1717 Pacific Avenue, Tacoma 98402
Courtroom I

New Bankruptcy Adversary Proceeding *Whitehead v. Wren*, 23-adv-4024-BDL

Dear Chambers:

The Plaintiff/Debtor filed an adversary proceeding yesterday to determine the proper amount of any claim, included secured claim, by the Wrens against the Lake Tapps Property. The issue is whether Whitehead borrowed money from Stanford & Sons or whether S&S simply paid the Debtor compensation for employment.

Mr. Whitehead's counsel has also come to understand that the Court is currently scheduling trials for December 2023.

Because all or nearly all necessary discovery has been completed in this matter or through related state-court proceedings, the Plaintiff asks that an earlier trial date be set for this new matter within 90 days, or before October 31, 2023.

At this point with the expertise developed by this Court, proceeding in Bankruptcy with adjudication of whether Stanford & Sons payments were loan disbursements or compensation for employment seems superior to, and faster than, refile in Pierce County Superior Court.

Sincerely,



Benjamin Ellison